

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MAKE THE ROAD NEW YORK, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

No. 18-cv-2445 (NGG) (TAM)

August 16, 2022

JOINT STATUS REPORT

Pursuant to the Court's Order of June 29, 2022, ECF 98, the parties submit the following report on the progress of negotiations.

On July 13, 2022, the parties met and conferred regarding Plaintiffs' May 24, 2022 settlement proposal. The Defendant agencies continue to review the documents at issue and consider Plaintiffs' proposal.

While the parties had intended to meet and confer again on August 10, 2022, *see* ECF No. 97, lead counsel for Defendants, Cormac Early, is suddenly out of the office on parental leave for several months, and the case was just reassigned to another U.S. Department of Justice attorney. In light of other obligations and leave scheduled in August, counsel for the parties agreed to next meet and confer on September 9, 2022.

The parties respectfully request that they be permitted to file a further joint status report on September 30, 2022, updating the Court on the progress of their negotiations, and, if appropriate, proposing a schedule for further proceedings.

Dated: August 16, 2022

/s/ Joshua T. Stehlik (by permission)
Joanna Elise Cuevas Ingram, Esq. (JC 2704)
NATIONAL IMMIGRATION LAW
CENTER
P.O. Box 170392
Brooklyn, NY 11217
Phone: (213) 377-5258

Michelle Lapointe, Esq. (pro hac vice)
NATIONAL IMMIGRATION LAW
CENTER
P.O. Box 247
Decatur, GA 30031
Phone: (213) 279-2508

Lisa Graybill, Esq. (pro hac vice)
NATIONAL IMMIGRATION LAW
CENTER
P.O. Box 40476
Austin, TX 78704
Phone: (213) 493-6503

Joshua T. Stehlik, Esq. (pro hac vice)
NATIONAL IMMIGRATION LAW
CENTER
3450 Wilshire Blvd #108-62
Los Angeles, CA 90010
Phone: (213) 639-3900

Counsel for Plaintiffs Make the Road, et al.

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

MARCIA BERMAN
Assistant Branch Director

/s/ Galen N. Thorp
GALEN N. THORP
Senior Trial Counsel (VA Bar No. 75517)
JOSHUA M. KOLSKY
Trial Attorney (D.C. Bar No. 993430)
U.S. Department of Justice
1100 L Street, NW
Washington, D.C. 20005
Tel: (202) 514-4781
E-mail: cormac.a.early@usdoj.gov

Counsel for Defendants